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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LOIS ANDELIN,

Plaintiff,

v.

Michael J. Astrue,
COMMISSIONER OF the SOCIAL
SECURITY ADMINISTRATION,

Defendant.

CIV NO 07-675 JF (RS)

STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF
TIME TO FILE PLAINTIFF'S
MOTION FOR SUMMARY
JUDGMENT AND/OR REMAND
(no hearing)

IT IS HEREBY STIPULATED by and between the parties, through their undersigned attorneys, pursuant to L.R. 6-2(a), and subject to approval of the Court, that Plaintiff may have an extension of 14 days, or from July 11, 2007 to July 25, 2007, in which to file her Motion for Summary Judgment and/or Remand.

Plaintiff's undersigned attorney here declares that: this is Plaintiff's second request for an extension for this filing, the only extensions for the case; The need for this extension is occasioned by the unforeseen extra time needed for perusing a larger than normal administrative record in order to develop factual arguments; The effect on deadlines, pursuant to the Procedural Order for Social Security Review Actions, would be to make Defendant's Cross-Motion (30 days after

1 Motion), and then Plaintiff's Reply (14 days after Cross-Motion), due on dates no
2 more than two weeks later than before, when the cross-motions would be
3 submitted without a hearing or needing to change the Court's schedule.

4 DATE: 07/11/07

/s/

James Hunt Miller
Attorney for Plaintiff

6 DATE: July 11, 2007

Scott N. Schools
United States Attorney

8 By: /s/

Deborah Lee Stachel
Special Assistant U.S. Attorney

11 PURSUANT TO STIPULATION, IT IS SO ORDERED.

13 DATE: 7/16/07


United States District Judge
Jeremy Fogel

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This signature is authorized by Defendant's counsel, as
communicated verbally (on the phone) to the filer.